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**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**CARLOS OCTAVIO** :  
**VLADIMIR SIMO-THEN,** :  
Petitioner :  
v. : CIVIL NO. 1:CV-00-1808  
: (JUDGE KANE)  
**CHARLES ZEMSKI, ET AL.,** :  
Respondents :  
: FILED  
: HARRISBURG, PA  
: DEC 2 2000

UNITED STATES DEFENDANT'S  
MOTION FOR ENLARGEMENT OF TIME

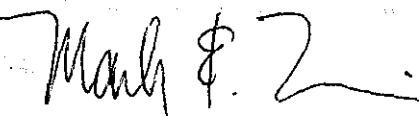
United States Respondents, by the United States Attorney's Office, request a twenty day enlargement of time in which to respond to Petitioner's Petition for Writ of Habeas Corpus. The grounds for said motion are as follows:

1. Petitioner filed, on October 12, 2000, a "Complaint for Declaratory and Injunctive Relief and Petition for Writ of Habeas Corpus".
2. On October 31, 2000, this Court issued an Order directing the Clerk of Court to serve a copy of the petition on Respondents and the United States Attorney, and directing that Respondents respond to the petition within twenty days of the date of the Order.
3. A copy of the Court's Order was not received by the United States Attorney's Office until yesterday, December 19, 2000.
4. This request for enlargement of time is filed to provide respondents with twenty days to respond to the petition, as the Court deemed by its Order.

WHEREFORE, The United States Respondents, respectfully requests this Court to grant this motion providing twenty days to respond to the petition.

Respectfully submitted,

DAVID M. BARASCH  
United States Attorney

  
MARK E. MORRISON  
Assistant U.S. Attorney  
Federal Building - Room 217  
228 Walnut Street  
P.O. Box 11754  
Harrisburg, PA 17108  
(717) 221-4482

Dated: Harrisburg, Pennsylvania  
December 20, 2000

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                                    |   |                               |
|------------------------------------|---|-------------------------------|
| <b>CARLOS OCTAVIO</b>              | : |                               |
| <b>VLADIMIR SIMO-THEN,</b>         | : |                               |
| <b>Petitioner</b>                  | : | <b>CIVIL NO. 1:CV-00-1808</b> |
| <br><b>v.</b>                      | : |                               |
|                                    | : | <b>(JUDGE KANE)</b>           |
| <br><b>CHARLES ZEMSKI, ET AL.,</b> | : |                               |
| <b>Respondents</b>                 | : |                               |

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

On this 20<sup>th</sup> day of December, 2000, she served a copy of the foregoing document by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania to:

Carlos O. V. Simo-Then  
00-00236  
Snyder County Prison  
600 Old Colony Road  
Slinsgrove, PA 17870

*Rebecca A. Plesic*  
REBECCA A. PLESIC  
Legal Secretary